

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

American Civil Liberties Union of Michigan,)	
)	
Plaintiff,)	No. 2:24-CV-12950-TGB-APP
vs.)	
)	Hon. Terrence E. Berg
John Does 1-6,)	
)	Mag. J. Anthony P. Patti
Defendants.)	
)	

NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO FRCP 41(a)(1)(A)(i)

Pursuant to Rule 41(a)(1)(A)(i), Plaintiff hereby provides notice that it is voluntarily dismissing this matter prior to the time that any opposing party has served an answer or a motion for summary judgment. The Temporary Restraining Order (TRO) issued by this Court was effective in ensuring that no further harassment or intimidation of voters was perpetrated by Defendants during the remainder of an election day in which many Michigan voters remained in line waiting to register and/or vote until late in the evening. The TRO will also be effective in giving notice to law enforcement and Defendants in future elections that conduct such as Defendants’—surveilling and harassing voters inside a polling station, aggressively approaching voters or obstructing their path to the polls while filming them, and recording voters coming and going from their automobiles—is unlawful. Such conduct violates both federal law, in the form of

the Voting Rights Act and the Ku Klux Klan Act, as well as the fundamental right to vote embedded in the Michigan Constitution. It likely consists of a felony under Michigan's Election Law as well. *See, e.g.*, MCL 168.932. Plaintiff will ensure that appropriate law enforcement agencies are well-apprised of the events described in its Complaint and will cooperate with law enforcement officials who may be in a position to hold Defendants accountable for their actions.

Respectfully submitted,

Dated: November 7, 2024

/s/ Philip Mayor

Theresa Lee*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street
New York, NY 10004
tlee@aclu.org

Rob Fram*
COVINGTON & BURLING LLP
415 Mission Street, Suite 5400
San Francisco, CA 94105
(415) 591-7025
RFram@cov.com

Philip Mayor (P81691)
Daniel S. Korobkin (P72842)
AMERICAN CIVIL LIBERTIES UNION
FUND OF MICHIGAN
2966 Woodward Ave.
Detroit, MI 48201
(313) 578-6803
pmayor@aclumich.org

Gregg Levy*
Kait Demers*
William Meyer*
Hassan Ahmad*
Stephanie King*
COVINGTON & BURLING LLP
850 Tenth Street, NW
Washington, DC 20001
(202) 662-5292
GLevy@cov.com
(202) 662-5896
KDemers@cov.com
(202) 662-5386
WMeyer@cov.com
(202) 662-5514
HAhmad@cov.com
(202) 662-5305

**Case dismissed prior to applications
for admission being submitted*

StKing@cov.com

Attorneys for Plaintiff